



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

SK/EMR/PP/MED/AA  
F. #2019R00927

*271 Cadman Plaza East  
Brooklyn, New York 11201*

February 9, 2023

By ECF

Honorable Brian M. Cogan  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Genaro Garcia Luna  
Criminal Docket No. 19-576 (BMC)

Dear Judge Cogan:

Earlier today the government received a copy of a letter from The New York Times Company regarding the sealing of various court filings. The government has reviewed the listed filings and proposes the following unsealing schedule:

The government does not object to the immediate unsealing of the following items:

- ECF No. 184
- ECF No. 185
- ECF No. 190
- ECF No. 193
- ECF No. 194
- ECF No. 196
- ECF No. 198
- ECF No. 199
- ECF No. 205
- ECF No. 206

Following the completion of trial, the government does not object to unsealing the following:

- ECF No. 151

The government respectfully submits that the following should remain under seal because they affect the interests of third parties. See United States v. Amodeo, 44 F.3d 141, 147 (2d Cir. 1995). To the extent that the items can be redacted to protect the interests of third parties, the government will submit proposed redactions to the Court.

- ECF No. 161, Attachment A
- ECF No. 187
- ECF No. 188
- ECF No. 189
- ECF No. 191
- ECF No. 192
- ECF No. 197

Respectfully submitted,

BREON PEACE  
United States Attorney

By: /s/  
 Saritha Komatireddy  
 Erin M. Reid  
 Philip Pilmar  
 Marietou E. Diouf  
 Adam Amir  
 Assistant U.S. Attorneys  
 (718) 254-7000

cc: Clerk of the Court (BMC)  
Defense Counsel of Record